

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

TRACY DORE, *individually and on behalf of all others similarly situated,*

Plaintiff,

v.

WELLS FARGO BANK, N.A.,

Defendant.

Case No. 2:19-cv-01601-MJH

Hon. Marilyn J. Horan

**UNOPPOSED MOTION TO STAY PROCEEDINGS PENDING FINAL APPROVAL OF CLASS SETTLEMENT**

Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) submits this unopposed motion seeking a stay of these proceedings until the United States District Court for the Northern District of California rules on whether to grant final approval of the proposed class settlement in *Hernandez v. Wells Fargo Bank, N.A.*, No. 3:18-cv-07354-WHA (N.D. Cal.). For the reasons set forth in the accompanying memorandum of law, a stay is warranted in this case. Wells Fargo therefore respectfully requests that the Court expeditiously enter the attached Proposed Order staying all proceedings in this action pending final approval of the settlement in *Hernandez*, and for all other relief the Court deems just and proper.

Dated: April 23, 2020

Respectfully submitted,

/s/ Amanda R. Cashman

Amanda R. Cashman  
PA ID #306843  
K&L Gates LLP  
K&L Gates Center  
210 Sixth Avenue  
Pittsburgh, PA 15222

Telephone: (412) 355-6331  
Email: amanda.cashman@klgates.com

Amanda L. Groves (*pro hac vice*)  
agroves@winston.com  
Kobi Kennedy Brinson (*pro hac vice*)  
kbrinson@winston.com  
WINSTON & STRAWN LLP  
300 South Tryon Street, 16th Floor  
Charlotte, NC 28202  
Tel: (704) 350-7700  
Fax: (704) 350-7800

*Counsel for Wells Fargo Bank, N.A.*

**CERTIFICATE OF SERVICE**

I certify that on April 23, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered parties.

Dated: April 23, 2020

/s/ Amanda R. Cashman

Amanda R. Cashman

*Counsel for Wells Fargo Bank, N.A.*